

Marcus Leinart
State Bar No. 00794156
Leinart Law Firm
11520 N. Central Exprwy, Ste 212
Dallas, TX 75243
469.232.3328 Phone
214.221.1755 Fax
ATTORNEY FOR DEBTOR

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

IN RE:	§	
	§	
IBEDTH CARRAJCO EDELL	§	CASE NO. 18-42226-btr-13
	§	
Debtor	§	CHAPTER 13

MOTION FOR CONTINUATION OF AUTOMATIC STAY

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW BEFORE THE COURT, Debtor Ibedth Carrajco Edell and files this his Motion for Continuation of Automatic Stay, and would respectfully show the Court the following:

1. This Court has jurisdiction over this matter pursuant to 11 U.S.C. §105 and 28 U.S.C. §1334. This matter constitutes a core proceeding pursuant to 28 U.S.C. §157(b). This Motion is additionally filed in accordance with 11 U.S.C. §362 (c)(3)(B).

2. Debtor filed the current voluntary petition for relief under Chapter 13 of Title 11 of the United States Code on 10/1/2018.

3. Debtor had previously filed a voluntary Petition for relief under Chapter 13 of the United States Code bearing the case number 16-41382-13. That case was filed on 8/1/2016, and was dismissed without prejudice on .

4. Debtors previous case was subsequently dismissed for .

5. A Motion for Relief filed.

6. A Notice of Appearance .

7. Debtor believes his financial situation will substantially improve, enabling him to complete his proposed Preliminary Chapter 13 Plan.

8. Debtor will show the Court his current case was not filed with the intent to hinder, delay or defraud his creditors.

9. Debtor understands his obligations specified under Chapter 13 Bankruptcy relief and will show the Court his financial ability to complete his proposed Plan.

WHEREFORE, PREMISES CONSIDERED, Debtor Ibedth Carrajco Edell respectfully requests this Court grant his request for continuance of the automatic stay concerning all scheduled creditors; and for any other relief in both law and equity as the Court may deem appropriate.

DATED: October 2, 2018

Respectfully Submitted,

LEINART LAW FIRM

By: /s/ Marcus Leinart
Marcus Leinart
State Bar No. 00794156
The Leinart Law Firm
11520 N Central Exprwy, Ste 212
Dallas, TX 75243-6113
469.232-3328 Phone
214.221.1755 Fax
ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

I hereby certify that on October 2, 2018, I did serve a true and correct copy of the foregoing to the following interested parties and to those listed on the matrix as filed with the

Court, by United States Mail, First Class;

Ibedth Carrajco Edell
2812 Sandray Ct
Plano, TX 75093

Office of the Standing Chapter 13 Trustee
Carey D. Ebert - Via ECF
500 N. Central Expressway, Suite 350
Plano, TX 75074

United States Trustee
110 N. College Ave, Ste 300
Tyler, TX 75702

/s/ Marcus Leinart
Marcus Leinart
Attorney for Debtor